

**REMARKS/ARGUMENTS**

Claims 6-16 are currently pending with claims 6-14 and 16 having been amended. Claims 6-14 and 16 have been amended to clarify the limitations recited in these claims, and not to overcome the rejections of the Office Action. Support for the amendments to the claims may be found in the specification as originally filed at page 10, page 11, and in FIGs. 3 and 4. No new matter has been added.

Claims 6-16 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Schubert et al. (U.S. Patent No. 6,742,034) [Schubert '034] in view of Schubert et al. (U.S. Patent No. 6,460,113) [Schubert '113].

The present invention is directed to a storage system. Aspects of the present invention as recited in independent claim 6 as amended, for example, include "a connection unit connected between said set of plural disk drive units and said plurality of controllers, said connection unit configured such that any of said controllers can communicate with any of said disk drive units."

As an initial matter, Applicants are in agreement with the Examiner that Schubert '034 fails to show or suggest a connection unit as recited in claim 6. Applicants respectfully disagree, however, that Schubert '113 makes up for the deficiencies of Schubert '034.

Specifically, Schubert '034 discusses a storage system configured to compensate for all visible storage being allocated to each server coupled to the storage system. More specifically, the Schubert '034 storage system is configured to mask select logical storage devices from select servers such that the select servers cannot allocate to themselves the masked logical storage devices. Masking prevents conflicts for memory use by servers by preventing the servers from using the same logical storage devices. Masking software is located on a central server at a central location such that the software does not need to be run on each host coupled to the storage system. Specifically, the masking software is run on an administration console 20 that is coupled to a set of servers and a storage controller, which is in turn coupled to one or more disk drive units organized as logical storage devices. See Schubert '034 of Col. 2, lines 31 - 38.

Schubert '113 discusses a storage system that includes a dedicated back up system 66 (see FIG. 2 of Schubert '113 and the discussion thereof at Col. 3, line 55 to Col. 4, line 21 ). The dedicated back up system is coupled through a SCSI/FI bridge 62 to a fibre channel switch 48. The Examiner has identified the fibre channel switch as being equivalent to the connection unit of claim 6, and asserts that the fibre channel switch is coupled between a set of plural disk drive units 56 and a storage controller 54. Applicants respectfully submit that the fibre channel switch is not coupled between the set of plural disk drives units 56 and the storage controller 54, but is coupled between storage controller 54 and servers 38 and 40 (see Schubert '113 at FIG. 2). Because the fibre channel switch of Schubert '113 is not couple between the set of plural disk drive units 56 and the storage controller 54, Schubert '113 fails to make up for the deficiencies of Schubert '034. Therefore, Schubert '034 and Schubert '113 fail to show or suggest every limitation of claim 6 as amended, and, therefore, Schubert '034 and Schubert '113 fail to render claim 6 obvious.

Schubert '034 and Schubert '113 not only fail to show or suggest the foregoing described limitations of claim 6, but also fail to show or suggest "said connection unit configured such that any of said controllers can communicate with any of said disk drive units," recited in claim 6. As an initial matter, Applicants reiterate their agreement with the Examiner that Schubert '034 fails to show or suggest the connection unit recited in claim 6. As an additional matter, nowhere does Schubert '113 describe the fibre channel switch as being configured "such that any of said controllers can communicate with any of said disk drive units." Applicants respectfully request the Examiner indicate the precise language in Schubert '113 that discusses the fibre channel switch being configured such that such that any of said controllers can communicate with any of said disk drive units. Because Schubert '113 fails to show or suggest the foregoing described limitations, Schubert '113 fails to make up for the admitted deficiencies of Schubert '034. Therefore, for at least the reasons above, as well as for these additional reasons, Schubert '034 and Schubert '113 fail to render claim 6 obvious.

As independent claim 16 recites similar limitations to those of independent claim 6 distinguished from Schubert '034 and Schubert '113 above, claim 16 is patentable over Schubert '034 and Schubert '113 for at least the above reasons.

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**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,



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